

Prob12C D/NV Form Rev. March 2017

## United States District Court for the District of Nevada

## PETITION FOR WARRANT FOR OFFENDER UNDER SUPERVISION

Name of Offender: **Iani S. Tassev** 

Case Number: **2:21CR00088** 

Name of Sentencing Judicial Officer: Honorable Gary L Sharpe

Date of Original Sentence: <u>July 15, 2019</u>

Original Offense: Conspiracy to Possess with Intent to Distribute Marijuana & Conspiracy

to Launder Monetary Instruments

Original Sentence: 128 Days prison, followed by 60 Months TSR.

Date Supervision Commenced: July 15, 2019

Date Jurisdiction Transferred to District of Nevada: March 12, 2021

Name of Assigned Judicial Officer: Honorable James C. Mahan

#### PETITIONING THE COURT

 $\boxtimes$  To issue a warrant.

The probation officer believes the offender has violated the following condition(s) of supervision:

- 1. <u>Do Not Commit Another Crime</u> You must not commit another federal, state or local crime.
  - A. On January 8, 2021, Tassev was arrested by Henderson Police Department for committing the offense of Battery Constituting Domestic Violence, 1<sup>st</sup> Off (Misdemeanor), in violation of Henderson Municipal 8.02.055.

On the above noted date, Tassev's live-in girlfriend, Lisa Merling called Henderson Police Department stating that Mr. Tassev hit her in her face during a verbal

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argument; and that she was bleeding. Responding officers observed Ms. Merling's left bottom lip to be significantly swollen with a small laceration and dried blood around her mouth. Tassev stated he tripped and fell into her, causing the injury.

Trial is scheduled for this matter on May 3, 2021 at 10:00 am for case number 21cr00169.

B. On March 17, 2021, Tassev was arrested by Henderson Police Department for Violating Domestic Violence Electronic Protective Order, 1<sup>st</sup> offense (Misdemeanor).

On January 8, 2021, an initial protective order was issued against Tassev directing him to have no contact with Lisa Merling, the victim in allegation #1A. The protective order was extended on February 9, 2021, and then again on March 8, 2021. Tassev violated this protective order when he showed up at their children's school and contacted his ex-girlfriend and verbally threatened her.

A criminal complaint was filed on April 8, 2021, and a criminal arraignment is scheduled for April 21, 2021, at 9:00 a.m. under case number 21cr001880.

C. On March 24, 2021, a supervision warrant (#4767362) was issued for Tassev by Henderson Municipal Court for Contempt of Court in violation of N.R.S. 266.570 and remains outstanding under case number 21M01325.

Tassev was required to complete a pretrial supervision program due to his arrest for domestic battery on January 8, 2021. Tassev failed to report to the officer as required and a warrant was issued.

2. <u>Must Not Leave District</u> - You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.

On April 14, 2021, this officer was notified by U.S. Marshal service (international branch) that Tassev was arrested in Canada on immigration charges. On April 15, 2021, this officer was notified by Customs and Border Protection Agent Jeff Sweeney that Tassev was currently in custody in Canada because he illegally entered the country. Tassev did not have permission to leave the federal judicial district of Nevada.

3. <u>Must Not Act As An Informant</u> - You must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.

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Tassev has continuously advised this officer as well as other law enforcement officers he has encountered that he is currently working as a confidential human source and informant for both the Federal Bureau of Investigations (FBI) and Drug Enforcement Administration (DEA). This officer contacted agents with both the FBI and the DEA and was advised that Tassev continues to contact agents in order to provide unsolicited information and has requested to be an informant and most recently has posted contact information for several agents online without authorization.

4. <u>Follow Instructions Of Probation Officer</u> - You must follow the instructions of the probation officer related to the conditions of supervision.

At onset of supervision, Tassev was directed by his probation officer to submit a complete and truthful written report within the first 10 days of each month.

On October 29, 2019, Tassev reported to the probation office and was provided with a login and password to complete and submit monthly supervision reports. Tassev submitted one report for October 2019 and has not submitted once since.

On March 5, 2021, Tassev was admonished for failing to complete the monthly supervision reports as required and was provided his login and password again and directed to complete all missing reports. As of this date, he has failed to complete monthly supervision reports from November 2019 to April 2021.

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#### **U.S. Probation Officer Recommendation:**

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⊠ Revoked

I declare under penalty of perjury that the information contained herein is true and correct,

Executed on April 15, 2021

Donnette

Johnson

16:57:00 -07'00'

Donnette Johnson

United States Probation Officer

Approved:

Digitally signed by Todd

Fredlund

Date: 2021.04.16 16:55:00

-07'00'

Todd Fredlund

Supervisory United States Probation Officer

### THE COURT ORDERS

□ No Action.

X The issuance of a warrant.

 $\Box$  The issuance of a summons.

 $\Box$  Other:

Signature of Judicial Officer

Cellus C. Mahan

April 19, 2021

Date

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# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA UNITED STATES V. IANI STAMENOV TASSEV, 2:21CR00088

# SUMMARY IN SUPPORT OF PETITION FOR WARRANT April 15, 2021

On July 15, 2019, Iani Tassev was sentenced in the United States District Court for the Northern District of New York to Time Served (128 days) followed by 5 years supervised release for the offenses of Conspiracy to Possess With Intent To Distribute Marijuana and Conspiracy to Launder Monetary Instruments. On July 15, 2019, Tassev commenced his term of supervised release; his supervision was then transferred to District of Nevada on September 24, 2019. On March 12, 2021, a transfer of jurisdiction was initiated, and jurisdiction was accepted in the District of Nevada on March 22, 2021.

On Friday, January 8, 2021, at approximately 11:32 a.m., Henderson Police Department (HPD) Officers responded to Iani Tassev's home in response to a call of domestic battery. The person reporting, Mr. Tassev's partner, Lisa Merling called dispatch stating that Mr. Tassev hit her in her face and that she was bleeding. The HPD officer observed Ms. Merling's left bottom lip to be significantly swollen with a small laceration and dried blood around her mouth. Mr. Tassev informed the HPD officer that he tripped and fell over the stairs when he was approached by Ms. Merling. The officer observed Mr. Tassev to have no injuries. Based on the totality of the situation, the officer determined Mr. Tassev committed the offense of Domestic Battery, a violation of 8.02.055. Mr. Tassev was subsequently arrested and booked into the Henderson Detention Center. Trial is scheduled for this matter on May 3, 2021, at 10 a.m. in Henderson Municipal Court under case 21cr00169.

On March 17, 2021, Tassev was arrested by Henderson Police Department for Violating Domestic Violence Electronic Protective Order (EPO), 1st offense (Misdemeanor). A criminal complaint was filed on April 8, 2021, and a criminal arraignment is scheduled for April 21, 2021 at 9:00 a.m. under case number 21cr001880.

On March 24, 2021, a supervision warrant (#4767362) was issued for Tassev by Henderson Municipal Court for Contempt of Court in violation of N.R.S. 266.570 and remains outstanding under case number 21M01325. Based on his pending court hearing dates and the nature of this new charge, Tassev was informed no future travel would be approved by the probation office until his cases were resolved.

On April 14, 2021, this officer was notified by U.S. Marshal service (international branch) that Tassev was arrested in Canada on immigration charges. On April 15, 2021, this officer was notified by Customs and Border Protection Agent Jeff Sweeney that Tassev was currently in custody in Canada because he illegally entered the country. It should be noted that Tassev has a special condition stating if he is deported or otherwise leaves the United States, he must not enter or attempt to enter without the permission of the Secretary of the Department Homeland Security. Agent Jeff Sweeney further advised that he was notified by the arresting agent that

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Tassev stated he was currently a confidential informant for the FBI, however Sweeney contacted the FBI and was advised that Tassev was lying and had been attempting to solicit agents to utilize him as a confidential informant.

It should be noted that, Tassev has continuously advised this officer as well as other law enforcement officers he has encountered recently that he is currently working as a confidential human source and informant for both the Federal Bureau of Investigations (FBI) and Drug Enforcement Administration (DEA). This officer contacted agents with both the FBI and the DEA and was advised that Tassev continues to contact agents in order to provide unsolicited information and has requested to be an informant and most recently has posted contact information for several agents online without authorization.

Additionally, Mr. Tassev has also failed to complete monthly reports from November 2019 to April 2021. Mr. Tassev was instructed to complete the missing reports by March 5, 2021, however he failed to do so. Tassev failed to follow instructions of his probation officer and left the country without approval; and is now currently in custody in Canada. Tassev still has unresolved pending state cases related to domestic battery against his wife and violation of a restraining order. Based on all the information stated above, Tassev is not only a flight risk but is also a danger. Therefore, it is respectfully requested that a warrant be issued to initiate revocation proceedings and Tassev be detained in custody pending his revocation hearing.

Respectfully submitted,

Donnette

Johnson

2021.04.16 16:57:24 -07'00'

Donnette Johnson

**United States Probation Officer** 

Approved:

Digitally signed by Todd

Fredlund

Date: 2021.04.16

16:55:22 -07'00'

Todd J. Fredlund

Supervisory United States Probation Officer